

Exhibit 31

I humbly present myself to your court to accept full responsibility for my actions related to the Dickens invoices and my conduct after my indictment and presentencing release. I understand my actions have been criminal and violated the conditions of my release and fully accept the punishment I have and will receive for these actions. The time I have spent defending myself and incarcerated has humbled me. It has allowed me to see the fallacy of my ways and I do not ever want to experience this process again. If your Honor can see me for the total man that I am and somehow decide I deserve leniency for my crimes, I pledge to do everything in my power to be an even stronger community leader, a stronger advocate for affordable housing, and a stronger mentor for young minority developers.

Growing up in Washington DC in the mid-80's was tough and dangerous. The city was still trying to rebound from the King riots that destroyed several sections of the city and the drug (crack) epidemic that took over almost every neighborhood in the city made it dangerous to walk out your front door. Yet and still, my parents provided a stable home environment for my two brothers and me. We had a middle class upbringing. My mother grew up very poor in NC and her ability to get a nursing degree and become an RN changed her life. She was determined to give her kids a better upbringing than she had and she did. Together, with my father, they owned a home, two cars, and were able to give my brothers and me a private Catholic school education. That was the essence of middle class America.

My Mother's tenacity to break the cycle of poverty in our family left an impression on me. She believed education was the key to improving any circumstance and a good education could forever change a person's life. This was reinforced by a neighborhood mentor I had, starting at age 8, Dr. Marie V. Woods. Dr. Woods was a speech writer for Adam Clayton Powell and later the Vice Provost for Hampton University. My mother & Dr. Woods instilled in me an understanding of the power of education and gave me a purpose for which to live my life.

As I got into my real estate career, I realized the middle class upbringing I had growing up was disappearing. No longer could people who helped build and maintain

the cities they worked in, afford to live in those same cities. Housing was becoming a two tiered system for the haves and the have nots. I have endeavored for the past 15 years to change that cycle and that is why I built Model Tobacco.

No one wanted to build Model Tobacco and no one thought it could be done. It had sat on the market for 10 years trying to find a developer to build develop it. It took me three years to convince Virginia Housing that this project could be built and would sustain itself on the Southside of Richmond.

What I set out to do, and accomplished, was to build a Class A, dignity enhancing apartment complex for renters who could not traditionally afford this type of housing. I wanted to preserve the missing middle. I was able to accomplish that goal but unfortunately, my accomplishment has been tainted by my actions during the demolition phase of the project. I understand my mistake and take full responsibility for my actions.

I am asking your Honor, in determining my sentence, to take into account my life's work and to understand I have more to give as a community leader, mentor, Father, and productive member of society.

I have learned my lesson. I still have a lot to contribute to society in mentorship for young minority developers, in consulting services for historic developers, in volunteering with youth in underserved communities, and especially, in raising my two young daughters. This has been very difficult for them. I have been an important part of their lives and I am suddenly gone. I will explain to them why this has happened and instill in them right from wrong and the importance of ~~not~~ always making the right decision and taking the responsibility for your mistakes. They will learn from me and my mistakes and will be better decision makers. I don't want the trauma of my absence to undie all the good work their mother and I have done in raising them.

I understand your Honor has a duty to sentence me based on the guidelines outlined in my sentencing report, but if your honor can take into account the totality of the man that I am and see fit to allow me leniency based upon my life's work, I promise

this court the return will be 10 fold. I will be a better citizen, a better mentor, a better community leader, and a better father. I can assure your Honor, I will never be before this court or any other court for the rest of my life.

Plenty Hawk
06/05/2025